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Sent: Tuesday, October 16, 2012 08:27 AM

To: Brooks.Phillip@epamail.epa.gov <Brooks.Phillip@epamail.epa.gov>; Dunn, Jason (ENRD)

Cc: Gordon.Polozola@nrgenergy.com <Gordon.Polozola@nrgenergy.com>

Subject: Re: Revised CDE

For PM, MATS requires PM CEMS and an emission rate of 0.03. The CD has the same requirements. Also, the certification of the CEMS are explicit in the MATS rule. The CD provisions, based on Part 60, really do not do anything except impose additional recordkeeping burdens. For other reasons we have discussed, we want to make these investments consistent with the MATS requirements rather than the CD.